

1       A.       Yes.

2       Q.       Why did you go back there? You had the same  
3 job at CCP, according to your earlier testimony.

4       A.       It was -- I liked working at LeoPalace, I liked  
5 working with Mr. Suzuki and the staff, it was a friendly  
6 environment, and I felt I was capable of doing a good  
7 job working there.

8       Q.       And so that relationship that you had with  
9 management early on wasn't the same? Are you testifying  
10 that it's not the same then after this?

11      A.       Correct, it's not the same anymore.

12      Q.       Mr. Roberts said you only worked there eight  
13 days afterwards, after the complaint became  
14 knowledgeable to management.

15      A.       I'm sorry; repeat your question.

16      Q.       Okay. Mr. Roberts said that Mr. Maruyama found  
17 out on August 17th about your complaint and that  
18 subsequent to that you only worked for eight days.

19      A.       Okay.

20      Q.       And you said you quit because you were  
21 stressed, but eight days, it was only eight days.

22      A.       It was eight days that I had to work, I really  
23 felt like I had to go to work, you know, make the most  
24 of it. I wasn't happy working -- I wasn't happy going  
25 to work knowing that I didn't have a good relationship

1 anymore with Mr. Maruyama. Or that Mr. Suzuki and  
2 everybody felt like we were the bad guys and they  
3 weren't talking to us anymore.

4 MR. ROBERTS: Objection; the witness is  
5 speculating as to what other people's feelings were.

6 A. Okay; sorry.

7 MR. ROBERTS: You don't have to say  
8 you're sorry. You can answer the question now that I've  
9 objected to it.

10 A. You know, I -- they didn't -- why? I felt I  
11 was doing my job and I continued going to work during  
12 those times even though we were short of staff. I --  
13 yeah, I really believed that everything was going to be  
14 better. I did my job, I provided excellent customer  
15 service and yet I got treated a lot differently, like no  
16 -- basically, it wasn't the same anymore.

17 Q. (By Mr. Torres) When you went to see the  
18 psychiatrist, you testified that you went on my  
19 recommendation.

20 A. Yes.

21 Q. How long have I known you?

22 A. A few years.

23 Q. And you came to see me as an attorney?

24 A. Friend attorney; yes.

25 Q. So we have both kinds of relationships?

1       A.     Yes.

2       Q.     And did you -- in your mind, was I making that  
3 recommendation to go see a psychiatrist as your friend  
4 or as your lawyer?

5       A.     A friend.

6       Q.     And that psychiatrist recommended that you take  
7 two weeks off?

8       A.     Yes.

9       Q.     And you didn't do that?

10      A.     No.

11      Q.     Why?

12      A.     Because I couldn't afford to take two weeks off  
13 and not be paid for it.

14      Q.     But everybody has bills; what do you mean you  
15 can't afford it?

16      A.     I had no other source of income. I had to take  
17 care of myself, my son -- you know, pay for my personal  
18 loans at the time.

19      Q.     Who's your son; how old is your son?

20      A.     He is four years old.

21      Q.     You were shown various declarations, Exhibits  
22 13, 14, 15 -- or 13 and 14.

23      A.     Okay.

24      Q.     13 is called a Supplemental Declaration. Did  
25 you know what this was specifically addressing?

1       A.       (No response.)

2       Q.       Do you know why you were requested to submit a  
3 supplemental declaration?

4       A.       To provide, provide information about what  
5 happened.

6       Q.       Okay. So at someone's request; is that what  
7 you're saying?

8       A.       Yes.

9       Q.       You were asked about three physical instances  
10 that happened to you. Were there any other physical  
11 instances that -- or you identified three physical  
12 instances that happened to you from Christine Camacho.  
13 Any others?

14      A.       Repeat your question, please.

15      Q.       Okay. Other than the three physical instances  
16 and the ongoing jokes, as it has been characterized, and  
17 you talked about the candles, any other particularly  
18 offensive things that come to mind?

19      A.       Yes.

20      Q.       What --

21      A.       There was a day that Christina started to put  
22 either tissue or a towel down her pants to -- and left  
23 it there, showing all of us that she had a penis.

24      Q.       Who's all of us?

25      A.       I believe I was there and Vivienne was there.

1 and I'm not too sure about with Rose. So myself and  
2 Vivienne, I remember being there.

3 Q. Management, when you went up to talk to them,  
4 along with Rose and Vivienne on August the 11 --

5 A. Okay.

6 Q. -- and by management I mean May Paulino, she  
7 asked you guys to come back and talk to her, right?

8 A. Okay; repeat your question.

9 Q. Okay. How many times did you talk to May on  
10 August the 11th?

11 A. I believe once during that interview.

12 Q. And she asked you a lot of questions, and said  
13 that she was going to conduct an investigation. Or, I'm  
14 sorry, she said that she was going to talk to other  
15 management.

16 A. Yes.

17 Q. Okay. And subsequent to that, two days later,  
18 they terminated -- they terminate Christina?

19 A. Yes.

20 Q. Did you ask her about whether or not she knew  
21 about any other instances prior to your complaint?

22 A. Did I ask who?

23 Q. May.

24 A. About other instances?

25 Q. Yes.

1           A.       No.

2           Q.       You testified that she knew about Greg's  
3 letter, or you thought she knew about Greg Perez'  
4 letter.

5                   MR. ROBERTS: Objection; leading.

6           Q.       (By Mr. Torres) Tell me what you know about  
7 Greg Perez.

8           A.       I know Greg Perez is the graveyard shift  
9 manager.

10          Q.       Okay. And your testimony was that he was aware  
11 of an incident that happened to Vivienne that Vivienne had  
12 told you; correct?

13          A.       Yes.

14          Q.       So I thought, and maybe this is a mistake, I  
15 thought you said that he had contacted Human Resources.

16          A.       I was told that Greg brought the letter down to  
17 May and spoke with her; that's what I was told by  
18 Vivienne.

19          Q.       Okay. When were you told that? I mean, when  
20 were you told that that had occurred?

21          A.       About maybe three to four weeks when I started  
22 working there.

23          Q.       Okay. Did you have any other reason, prior to  
24 your personal complaint to May Paulino, to believe that  
25 they knew of the instances that were happening to you

1 guys?

2 A. Okay; repeat the question.

3 Q. Do you think management was ever informed by  
4 complaint on any other occasion of what was happening at  
5 the front desk?

6 MR. ROBERTS: Objection; leading.

7 A. I don't know. I remember Rose talking to  
8 Christina also.

9 Q. (By Mr. Torres) So I am unsure why you didn't  
10 just go upstairs sooner to talk about all this with May  
11 Paulino or downstairs, as the case may be.

12 A. I don't know.

13 Q. In your declaration -- or just to digress, go  
14 back to this. In Exhibit 15, Mr. Griffin says that your  
15 hours were reduced from five days to three days. And  
16 you testified that's five days or four days?

17 A. Yes.

18 Q. Okay. You told Mr. Griffin that you did not  
19 believe that Ms. Paulino thought sexual harassment was a  
20 sensitive matter that needed to be corrected  
21 immediately.

22 MR. ROBERTS: I think she testified to  
23 this earlier, Phil. So I guess I object on that ground.

24 A. Repeat your question.

25 Q. (By Mr. Torres) Mr. Griffin writes that you

1 informed him that Ms. Paulino did not view sexual  
2 harassment as a sensitive matter that needed to be  
3 corrected immediately.

4 MR. ROBERTS: Objection; I think that  
5 mischaracterizes the exhibit, but I'll read it to find  
6 out.

7 MR. TORRES: Okay.

8 MR. ROBERTS: It actually says that  
9 Jennifer denies that May said at the meeting that sexual  
10 harassment... she didn't deny that sexual harassment --  
11 she didn't say that --

12 MR. TORRES: Okay.

13 MR. ROBERTS: -- May Paulino denied that  
14 sexual harassment was a sensitive matter. She said May  
15 did not say that in the meeting. And I object on the  
16 grounds it mischaracterizes Mr. Griffin's exhibit and  
17 the witness' testimony.

18 MR. TORRES: Okay, I'll strike the  
19 question.

20 Q. (By Mr. Torres) So when you left that meeting,  
21 did you feel that something was going to be done -- or  
22 did you expect that something was going to be done on  
23 August the 11th, 2004?

24 A. Yes, I expected something to be done.

25 Q. After the decision was made or after she was



1 terminated, Christina, did anybody come and talk to you  
2 and tell you what their decision was, anybody from  
3 management?

4 A. We just got the phone call from May on Friday  
5 stating that she was fired.

6 Q. Okay. And did she tell you why?

7 A. No; I don't remember.

8 Q. Did she ask if you needed any further  
9 assistance?

10 A. No, she did not.

11 Q. Did she ever follow up with you after the  
12 decision to terminate Christina on the 13th?

13 A. No.

14 Q. Did anybody from management ever come by and  
15 follow up, to ask how you were?

16 A. No.

17 MR. TORRES: Okay; I have nothing  
18 further.

19 MS. MORRISON: I don't have anything.

20 REDIRECT EXAMINATION

21 BY MR. ROBERTS:

22 Q. In fact -- well, you said you expected  
23 something to be done on Wednesday, August 11th when you  
24 went up to talk to May?

25 A. Yes.

1       Q.       Wasn't Christine Camacho ordered by May to go  
2 home when she arrived at work the very next morning, and  
3 to stay there?

4       A.       Yes. She stayed on the premises for at least  
5 four hours that day riding the shuttle van.

6       Q.       Yeah. And how did -- at what point did she  
7 leave the premises?

8       A.       I don't know at what point, but all I know is  
9 that we continually saw her riding the shuttle van; and  
10 again, May -- we told May, "She's still here. She's  
11 still on the premises."

12      Q.       And then what happened?

13      A.       And then I believe eventually she left.

14      Q.       Was she escorted out by security?

15      A.       I don't know.

16      Q.       And, in fact, she was terminated on Friday,  
17 August 13th, right?

18      A.       Yes.

19      Q.       And so do you fault the way that LeoPalace  
20 fired Ms. Camacho?

21                   MS. MORRISON: Objection; vague.

22      Q.       (By Mr. Roberts) I mean, what did LeoPalace do  
23 wrong in firing Ms. Camacho?

24                   MS. MORRISON: Same objection.

25      A.       What did they do wrong in firing her?

1       Q.     Let's start again. Was firing Ms. Camacho the  
2 right thing to do on August 13th?

3       A.     Yes.

4       Q.     And do you think that she should have been  
5 fired on the spot on August 11th?

6       A.     I'm lost.

7       Q.     Let me withdraw the question.

8       A.     Okay.

9       Q.     Wasn't it reasonable for LeoPalace to take a  
10 day or two to investigate all these matters that have  
11 been alleged against Christine before firing her?

12                   MS. MORRISON: Objection; vague?

13       A.     Yes, but I don't know why it took them that  
14 long.

15       Q.     (By Mr. Roberts) Well, they were advised --  
16 this discussion you had with May was at the -- near the  
17 end of the normal workday on August 11th, right?

18       A.     Yes.

19       Q.     And then the next day is Thursday, August 12th,  
20 and May had instructed Christina to go home in the  
21 morning and to stay home. Right?

22       A.     I believe she was -- I believe she was told on  
23 Wednesday to go home.

24       Q.     Your understanding is she was told immediately  
25 to go home on August 11th after you and --

1 A. After Rose made a complaint; yes.

2 Q. Okay. And then she was supposed to stay home  
3 on Thursday, but she apparently came to work and rode  
4 the shuttle; is that your understanding?

5 A. No, Thursday -- it was Friday, I believe, she  
6 came to LeoPalace.

7 Q. Did she work Thursday?

8 A. No.

9 Q. And Friday she came to LeoPalace and that's  
10 when May said, "Go home and we'll get back to you,"  
11 right?

12 A. No; Friday she was terminated.

13 Q. Okay. So where's the delay?

14 MS. MORRISON: Argumentative; objection.

15 Q. (By Mr. Roberts) So you consider one day to be  
16 a delay?

17 A. I consider -- since Vivienne's incident that  
18 happened, and from there on two and a half months added  
19 all up, that's -- I think it should have been taken  
20 cared of the first time.

21 Q. I understand your testimony now. As I take it,  
22 when you're saying there was a delay in firing her,  
23 you're not talking about the time period between August  
24 11th and August 13th when she was fired, right?

25 A. (Witness nodded head in the affirmative.)

1 Q. Right?

2 A. Right.

3 Q. So you saw a job opening for a job as a  
4 personal assistant with Yutaka Maruyama in early August?

5 A. I believe so.

6 Q. And around the same time, May Paulino had  
7 recommended you for that job?

8 A. Yes.

9 Q. To Mr. Maruyama?

10 A. Yes.

11 Q. And were you interested in that job?

12 A. Yes.

13 Q. And on August 11th you were still considering  
14 whether you wanted that job or not?

15 A. Yes.

16 Q. So this would have been a job that you would  
17 have taken if -- would you have taken this job if it had  
18 become available?

19 A. Yes.

20 Q. You said that you were afraid every day, at  
21 least eight days that you say you worked --

22 A. Okay.

23 Q. -- after your sexual harassment complaint, you  
24 were afraid every day that Maruyama would yell at you.

25 A. I was afraid something might happen.

1       Q.     In fact, he never did yell at you in the eight  
2 days; did he?

3       A.     And I corrected myself and I said raised his  
4 voice.

5       Q.     Yeah. He never did raise his voice to you in  
6 those eight days; did he?

7       A.     Did not talk to me at all.

8               MR. ROBERTS: That's all the questions I  
9 have.

10              MR. TORRES: I have none.

11              MR. ROBERTS: The court reporter is  
12 going to type up everything that I said and everything  
13 you said and the other lawyers said today, and it's  
14 going to -- she's going to put it in a transcript form,  
15 it's going to look a lot like this.

16              THE WITNESS: Yes.

17              MR. ROBERTS: It's going to look a lot  
18 like that because in fact it says Cecilia Flores right  
19 there, and that's Cecilia Flores.

20              THE WITNESS: Okay.

21              MR. ROBERTS: It's going to be a lot  
22 thicker. So you'll have a chance to read it and you'll  
23 see -- like I said earlier, you may see some things you  
24 think are wrong. If you make a change and it's a  
25 substantive change like a yes to a no, I'll have the

1 right to argue that your credibility is suspect later.

2 THE WITNESS: Okay.

3 MR. ROBERTS: So be cautious in what you  
4 do, and take your time in reading the transcript. And  
5 the transcript will go to your lawyer, I take it, Phil  
6 Torres?

7 MR. TORRES: Yes; that's good.

8 MR. ROBERTS: Okay, that's all there is  
9 then, Jennifer. Thank you.

10 THE WITNESS: Thank you.

11 (Whereupon, at 11 o'clock a.m., the  
12 deposition was concluded.)

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CERTIFICATE OF WITNESS

I, Jennifer Holbrook, do hereby certify that I have read, or had read to me, the foregoing typewritten pages 1 through 154, inclusive. My changes thereto, if any, have been noted on a separate sheet of paper, which I have signed, and which I understand will be appended to and made a part of this deposition. I certify that the same is now a true and correct transcript of my testimony.

\_\_\_\_\_  
Jennifer Holbrook

(Dated) \_\_\_\_\_



## REPORTER'S CERTIFICATE

I, Cecilia F. Flores, Freelance Stenotype Reporter, hereby certify the foregoing 154 pages to be a true and correct transcript of the stenographic shorthand notes and audio recording taken by me in the within-entitled and numbered case at the time and place as set forth herein.

Dated at Hagatna, Guam, this 14th day of April, 2007.



Cecilia F. Flores

## CLERK'S CERTIFICATE

Superior Court Of Guam:

I, Cecilia F. Flores, Special Deputy Clerk, Superior Court of Guam, do hereby certify that on Saturday, the 17th day of March, 2007 at the hour of 7 o'clock a.m. there appeared before me Jennifer Holbrook at the law offices of Dooley Roberts & Fowler, LLP, Suite 201, Orlean Pacific Plaza, 865 South Marine Corps Drive, Tamuning, Guam 96913, the deponent herein, produced pursuant to Notice to give her deposition in the within-entitled and numbered CIVIL CASE NO. 1:06-CV-00028; that prior to the examination the deponent was by me duly sworn upon her oath; that thereafter the deposition transcript was prepared by me, and the Certified Original Transcript was presented to Mr. Torres' office for the deponent's review, corrections, if any, and execution.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor a relative or employee of such attorney or counsel, and that I am not directly or indirectly interested in the matters in controversy.

In testimony whereof, I have hereunto set my hand and seal of Court this 14th day of April, 2007.





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Dooley Roberts & Fowler LLP  
Suite 201, Orlean Pacific Plaza  
865 South Marine Corps Drive  
Tamuning, Guam 96913  
Telephone (671) 646-1222  
Facsimile (671) 646-1223

Attorneys for Defendant LeoPalace Resort

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IN THE DISTRICT COURT

OF GUAM

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

LEO PALACE RESORT,

Defendant.

JENNIFER HOLBROOK,  
VIVIENE VILLANUEVA and  
ROSEMARIE TAIMANGLO,

Plaintiff-Intervenors,

vs.

MDI GUAM CORPORATION dba LEO  
PALACE RESORT MANENGGON HILLS  
and DOES 1 through 10,

Defendants.

CASE NO. 06-00028

DEFENDANT LEOPALACE RESORT'S  
FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO PLAINTIFF-  
INTERVENORS; CERTIFICATE OF  
SERVICE



**TO: Plaintiff-Intervenors Jennifer Holbrook, Vivienne Villanueva and  
Rosemarie Taimanglo and their attorney of record, Teker Torres & Teker, P.C.**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant LeoPalace Resort,



("Defendant") hereby requests Plaintiff-Intervenors Jennifer Holbrook, Vivienne Villanueva and Rosemarie Taimanglo, to make available for inspection and copying at the offices of Dooley Roberts & Fowler LLP, Suite 201, Orlean Pacific Plaza, 865 South Marine Corps Drive, Tamuning, Guam 96913, within thirty days from today's date, the documents described herein.

### **DEFINITIONS**

1. The word "document" includes writings, drawings, graphs, charts, photographs, and all electronic data capable of being converted into a document, such as email.
2. The pronoun "you" or "your" refers to Plaintiff.

### **INSTRUCTIONS**

1. Under Rule 34(b) of the Federal Rules of Civil Procedure you are required to produce the requested documents as they are kept in the usual course of business or to organize and label them to correspond with the categories in this request.
2. For each document responsive to this request that is withheld under a claim of privilege or work-product immunity, provide a statement under oath, by a person having personal knowledge, setting forth as to each document or portion withheld:
  - (a) The number and subject of each paragraph of this request that seeks its production;

- (b) The name and title of the author(s);
- (c) The name and title of each person to whom the document was addressed;
- (d) The name and title of each person to whom a copy of the document was sent;
- (e) The date of the document;
- (f) The number of pages;
- (g) A brief description of the nature and subject matter of the document;
- (h) The identity of each person to whom the document, its contents, or any portion thereof is known or has been disclosed;
- (i) The exact location of the original and each copy of the document as of the date of receipt of this request; and
- (j) If the document is withheld on any ground other than privilege, each basis that Plaintiff contends justifies its withholding.

3. If you are aware of any document otherwise responsive to these requests that is no longer in your custody or control, please identify the name and title of the author, the name and title of the addressee, the date of the document, the subject matter of the documents, the last date on which the document was in your control, the person(s) or entity, if any, now in control of the document, the reasons for your disposition or release of the document, all persons who have knowledge of the circumstances surrounding its disposition, and state what knowledge each such person has.

4. Reference to the singular includes the plural and reference to the plural includes the singular.

**DOCUMENTS REQUESTED**

Plaintiff-Intervenors are requested to produce the following documents:

1. All documents generated by any health care provider related to any treatment received by the Claimants as a result of the incidents made the subject of suit in this civil action. LeoPalace will agree to any reasonable confidentiality agreement with respect to the production of these documents.

2. All documents evidencing the Claimants' income earned from any source for the years 2001, 2002, 2003, 2004, 2005, and 2006, including their tax returns. LeoPalace will agree to any reasonable confidentiality agreement with respect to the production of these documents.

3. All documents prepared by LeoPalace's former Night Manager Gregory Perez related to any of the incidents made the subject of suit in this civil action.

DOOLEY ROBERTS & FOWLER LLP

Dated: 1/31/07

By:   
**TIM ROBERTS, ESQ.**  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I, Tim Roberts, hereby certify that on the 31<sup>st</sup> day of January, 2007, I caused the Defendant LeoPalace Resort's First Request for Production of Documents to Plaintiff-Intervenors to be served upon the following via US Mail and email:

Angela Morrison  
**U.S EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**  
255 East Temple Street, Fourth Floor  
Los Angeles, California 90012

I further certify that on the 31<sup>st</sup> day of January, 2007, I caused a copy of Defendant LeoPalace Resort's First Request for Production of Documents to Plaintiff-Intervenors to be served upon the following via hand delivery:

Philip Torres, Esq.  
**TEKER TORRES & TEKER, P.C.**  
130 Aspinall Avenue, Suite 2A  
Hagåtña, Guam 96910

Dated: 1/31/07

  
\_\_\_\_\_  
**TIM ROBERTS**



# AUTHORIZATION FOR THE RELEASE OF RECORDS

Patient Name: Jennifer Holbrook Date of Birth: [REDACTED] S.S. No. [REDACTED]

1. I authorize the use or disclosure of the above named individual's health information as described below.

2. The following individual(s) or organization(s) are authorized to make the disclosure:

Name: All Medical Clinics and Related Facilities

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

3. The type of information to be used or disclosed is as follows (check the appropriate boxes and include other information where indicated).

- ☐ Any and all Medical and/or Dental Records including any and all reports and hand written notes
- ☐ Workers Compensation Records
- ☐ Billing Records, Ledgers and Payment Information
- ☐ X-Ray film, Cat Scan film, MRI film
- ☐ Scholastic and Academic Records
- ☐ Insurance Claim records including Medical Reports and Bills
- ☐ Disability Records
- ☐ Employment and Payroll Records
- ☒ All of the above
- ☐ Other

4. I understand that the information in my records may include information relating to sexually transmitted disease, Acquired Immunodeficiency Syndrome (AIDS), or Human Immunodeficiency virus (HIV). It may also include information about behavioral or mental health services and treatment for alcohol and drug abuse.

5. The information identified above may be used by or disclosed to the following individuals or organization(s):

Name: Tim Roberts, Esq.

Address: 865 S. Marine Corps Drive, Suite 201,  
Tamuning, Guam 96913

Telephone No. 671-646-1222

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

6. The information for which I am authorizing disclosure will be used for the following purpose:

Litigation discovery



7. I understand that I have a right to revoke this authorization at any time. I understand that if I revoke this authorization, I must do so in writing and present my written revocation to the health information management department, I understand the revocation will not apply to information that has already been released in response to this authorization. I understand that the revocation will not apply to my insurance company when the law provides my insurer with the right to contest a claim under my policy.

8. This authorization will expire (insert date or event) December 31, 2007. If fail to specify an expiration date, this authorization will expire six months from the date on which it was signed.

9. I understand that once the above information is disclosed, it may be re-disclosed by the recipient and the information may not be protected by federal privacy laws or regulations.

10. I understand authorizing the use or disclosure of the information identified above is voluntary, I need not sign this form to ensure health care treatment.

\*\* A copy of this Authorization Release shall be considered as valid as the original.

Date: \_\_\_\_\_

Signed: Jennifer Holbrook  
Patient or legal representative

## AUTHORIZATION FOR THE RELEASE OF RECORDS

Patient Name: Rosemarie B. Taimanglo Date of Birth: [REDACTED] S.S. No.: [REDACTED]

1. I authorize the use or disclosure of the above named individual's health information as described below.

2. The following individual(s) or organization(s) are authorized to make the disclosure:

Name: All Medical Clinics and Related Facilities

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

3. The type of information to be used or disclosed is as follows (check the appropriate boxes and include other information where indicated).

- ☐ Any and all Medical and/or Dental Records including any and all reports and hand written notes
- ☐ Workers Compensation Records
- ☐ Billing Records, Ledgers and Payment Information
- ☐ X-Ray film, Cat Scan film, MRI film
- ☐ Scholastic and Academic Records
- ☐ Insurance Claim records including Medical Reports and Bills
- ☐ Disability Records
- ☐ Employment and Payroll Records
- ☒ All of the above
- ☐ Other

4. I understand that the information in my records may include information relating to sexually transmitted disease, Acquired Immunodeficiency Syndrome (AIDS), or Human Immunodeficiency virus (HIV). It may also include information about behavioral or mental health services and treatment for alcohol and drug abuse.

5. The information identified above may be used by or disclosed to the following individuals or organization(s):

Name: Tim Roberts, Esq.

Address: 865 S. Marine Corps Drive, Suite 201,

Telephone No. 671-646-1222

Tamuning, Guam 96913

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

6. The information for which I am authorizing disclosure will be used for the following purpose:

Litigation discovery

7. I understand that I have a right to revoke this authorization at any time. I understand that if I revoke this authorization, I must do so in writing and present my written revocation to the health information management department, I understand the revocation will not apply to information that has already been released in response to this authorization. I understand that the revocation will not apply to my insurance company when the law provides my insurer with the right to contest a claim under my policy.

8. This authorization will expire (insert date or event) December 31, 2007. If fail to specify an expiration date, this authorization will expire six months from the date on which it was signed.

9. I understand that once the above information is disclosed, it may be re-disclosed by the recipient and the information may not be protected by federal privacy laws or regulations.

10. I understand authorizing the use or disclosure of the information identified above is voluntary, I need not sign this form to ensure health care treatment.

\*\* A copy of this Authorization Release shall be considered as valid as the original.

Date: \_\_\_\_\_

Signed: \_\_\_\_\_

Rosemarie B. Taimanglo

Patient or legal representative

## AUTHORIZATION FOR THE RELEASE OF RECORDS

Patient Name: Vivienne D.V. Villanueva Date of Birth: [REDACTED] S.S. No.: [REDACTED]

1. I authorize the use or disclosure of the above named individual's health information as described below.
2. The following individual(s) or organization(s) are authorized to make the disclosure:

Name: All Medical Clinics and Related Facilities

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

3. The type of information to be used or disclosed is as follows (check the appropriate boxes and include other information where indicated)

- ☐ Any and all Medical and/or Dental Records including any and all reports and hand written notes
- ☐ Workers Compensation Records
- ☐ Billing Records, Ledgers and Payment Information
- ☐ X-Ray film, Cat Scan film, MRI film
- ☐ Scholastic and Academic Records
- ☐ Insurance Claim records including Medical Reports and Bills
- ☐ Disability Records
- ☐ Employment and Payroll Records
- ☒ All of the above
- ☐ Other

4. I understand that the information in my records may include information relating to sexually transmitted disease, Acquired Immunodeficiency Syndrome (AIDS), or Human Immunodeficiency virus (HIV). It may also include information about behavioral or mental health services and treatment for alcohol and drug abuse.

5. The information identified above may be used by or disclosed to the following individuals or organization(s):

Name: Tim Roberts, Esq.

Address: 865 S. Marine Corps Drive, Suite 201,  
Tamuning, Guam 96913

Telephone No. 671-646-1222

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone No. \_\_\_\_\_

6. The information for which I am authorizing disclosure will be used for the following purpose:

Litigation discovery

7. I understand that I have a right to revoke this authorization at any time. I understand that if I revoke this authorization, I must do so in writing and present my written revocation to the health information management department, I understand the revocation will not apply to information that has already been released in response to this authorization. I understand that the revocation will not apply to my insurance company when the law provides my insurer with the right to contest a claim under my policy.
8. This authorization will expire (insert date or event) December 31, 2007. If fail to specify an expiration date, this authorization will expire six months from the date on which it was signed.
9. I understand that once the above information is disclosed, it may be re-disclosed by the recipient and the information may not be protected by federal privacy laws or regulations.
10. I understand authorizing the use or disclosure of the information identified above is voluntary, I need not sign this form to ensure health care treatment.

\*\* A copy of this Authorization Release shall be considered as valid as the original.

Date: \_\_\_\_\_

Signed: Vivienne D.V. Villanueva  
Patient or legal representative





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UNIONS

RETURN OF COMPANY PROPERTY

                      
                    

QUESTIONS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

PERSONNEL DEPARTMENT:

                     6/7/04  
(Signature and Date)

I, understand all information covered. I, also, acknowledge receipt of the Employee Orientation Packet.

x                      6/7/04  
(Employee Signature and Date)

